IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DAVID FANCHER; LEE FUTRELL; JOHN ORUE; CRAIG UNTERBERG; ARIEL ALVARADO; DENNIS TOLES;)	Civil Action No.: 2:22-cv-00026
CAROLE CARLSON; DENNIS MONROE;)	
and RICHARD HENDERSON,)	COMPLAINT JURY TRIAL DEMANDED
Plaintiffs,)	Kidney Cancer
vs.)	
UNITED STATES OF AMERICA,)	
Defendant.)	

INTRODUCTION

Plaintiffs DAVID FANCHER; LEE FUTRELL; JOHN ORUE; CRAIG UNTERBERG; ARIEL ALVARADO; DENNIS TOLES; CAROLE CARLSON; DENNIS MONROE; and RICHARD HENDERSON (collectively "Plaintiffs") file this Complaint against Defendant UNITED STATES OF AMERICA ("Defendant"). This Complaint alleges a federal cause of action and is brought solely pursuant to Section 804(b) of the "Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act," also known as the "Camp Lejeune Justice Act of 2022" (hereinafter "the Act"). Plaintiffs allege the following:

1. For decades the water at Marine Corps Base Camp Lejeune was contaminated with toxic chemicals known to cause cancer and a host of other chronic—often deadly—diseases and conditions. Hundreds of thousands of servicemembers and civilians drank, bathed in, cooked with, and swam in that water. Nevertheless, in violation of governing orders and basic duties of decency, federal government officials failed to ensure that toxic chemicals from industrial facilities, fuel

EAST Search History

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S10	11	S9 and batter\$4	US-PGPUB; USPAT; USOCR; EPO; JPO; DERWENT; IBM_TDB	OR	ON	2006/06/06 13:15
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S15	1	"6318874".PN.	USPAT; USOCR	OR	ON	2006/06/07 17:00
S16	1	"6612713".PN.	USPAT; USOCR	OR	ON	2006/06/07 17:00
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